

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

REBEKAH HARRIS,

CASE NO.

Plaintiff,

vs.

TRANSUNION, LLC,

Defendant.

TRANS UNION, LLC’S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the Justice Of The Peace Court State Of Delaware In And For New Castle County, to the United States District Court District Of Delaware, on the following grounds:

1. Plaintiff Rebekah Harris served Trans Union on or about July 19, 2023, with Correspondence From Plaintiff To Trans Union, LLC (“Plaintiff’s Correspondence”), a Civil Cover Sheet (“Plaintiff’s Civil Cover Sheet”) and a Complaint (“Complaint”), filed in the Justice Of The Peace Court State Of Delaware In And For New Castle County. Copies of Plaintiff’s Correspondence, Plaintiff’s Civil Cover Sheet and Complaint are attached hereto as **Exhibit A**, **Exhibit B**, and **Exhibit C**, respectively. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See generally Complaint.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Justice Of The Peace Court State Of Delaware In And For New Castle County, to the United States District Court District Of Delaware.

5. As of the date of this Notice Of Removal, Defendant Trans Union, LLC is the only Defendant in this case.

6. Notice of this removal will promptly be filed with the Justice Of The Peace Court State Of Delaware In And For New Castle County, and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Justice Of The Peace Court State Of Delaware In And For New Castle County, to this United States District Court, District Of Delaware.

Date: July 27, 2023

Respectfully submitted,

/s/ Blake A. Bennett

Blake A. Bennett (#5133)

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Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **27th day of July, 2023**, properly addressed as follows:

<u>Pro Se Plaintiff</u> Rebekah Harris 2615 Chipmunk Ct. Bear, DE 19701	
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/s/ Blake A. Bennett
Blake A. Bennett (#5133)